

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

WESTERNGECO L.L.C.,

Plaintiff,

VS.

ION GEOPHYSICAL CORPORATION,  
FUGRO-GEOTEAM, INC., FUGRO-  
GEOTEAM AS, FUGRO NORWAY  
MARINE SERVICES AS, FUGRO, INC.,  
FUGRO (USA), INC. AND FUGRO  
GEOSERVICES. INC.

Defendants.

CIVIL ACTION NO. 4:09-cv-01827

Judge Keith P. Ellison

**JOINDER IN ION GEOPHYSICAL CORPORATION'S RESPONSES IN OPPOSITION  
TO PLAINTIFF WESTERNGECO L.L.C'S MOTIONS FOR SUMMARY JUDGMENT**

Fugro-Geoteam, Inc., Fugro-Geoteam AS, Fugro, Inc., Fugro (USA), Inc., and Fugro Geoservices, Inc. (collectively, “the Fugro Defendants”) hereby join Defendant ION Geophysical Corporation’s Response in Opposition to Plaintiff Westerngeco’s Motion for Summary Judgment on Defendants’ Inventorship Counterclaims and Derivative Defenses and Claims (Dkt. 185.) and the portions of Ion Geophysical Corporation’s Response to in Opposition to Plaintiff WesternGeco’s L.L.C’s Motion for Summary Judgment on ION’s Inequitable Conduct Defense and Antitrust Counterclaim Regarding the Zajac ‘038 Patent (Dkt. 183.) regarding inequitable conduct. Both of these pleadings (Dkt. 183, 185) are hereby incorporated by reference in their entirety, including all exhibits.

Dated: November 14, 2011

Respectfully submitted,

s/ Jason Saunders

Gordon Arnold

Texas Bar No.: 01342410

Federal ID No.: 12483

Attorney-in-Charge

garnold@arnold-iplaw.com

Jason A. Saunders

Texas Bar No.: 24042406

Federal ID No.: 557143

jsaunders@arnold-iplaw.com

Arnold & Knobloch L.L.P.

4900 Woodway, Suite 900

Houston, Texas 77056

Telephone: (713) 972-1649

Facsimile: (713) 972-1180

John M. Elsley

Texas Bar No.: 06591950

Federal ID No.: 2828

Jason C. Petty

Texas Bar No.: 24065902

Federal ID No.: 1120630

Royston, Rayzor, Vickery & Williams,  
L.L.P.

711 Louisiana, Suite 500

Houston, Texas 77002-6418

Telephone: (713) 224-8380

Facsimile: (713) 225-9945

**ATTORNEYS FOR DEFENDANTS,  
FUGRO-GEOTEAM, INC.,  
FUGRO, INC.,  
FUGRO (USA), INC.,  
FUGRO GEOSERVICES, INC., AND  
FUGRO-GEOTEAM AS**

**CERTIFICATE OF SERVICE**

I hereby certify that, on November 14, 2011 a true and correct copy of the Fugro Defendant's Joinder in Ion Geophysical Corporation's Responses in Opposition to Plaintiff Westerngeco L.L.C's Motions for Summary Judgment was served on all counsel of record *via CM/ECF*.

/s/ Jason Saunders

Arnold & Knobloch L.L.P.